

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

James Wooden,
Vernice Wooden,

Debtors.

Case No. 21-10885-amc

Chapter 13

Related to ECF No. 56

**Debtors' Objection to Motion for Relief from Stay filed by NewRez LLC
d/b/a Shellpoint Mortgage Servicing**

AND NOW, Debtors James Wooden and Vernice Wooden, by and through their attorney, hereby objects to the Motion for Relief from Stay filed by NewRez LLC d/b/a Shellpoint Mortgage Servicing. Because the Debtors can cure any arrearage either directly or through the plan, no grounds for relief exist.

NOW, THEREFORE, the Debtors ask this Court to deny the Motion in the form of order attached and to grant such other and further relief in their favor as may be necessary and proper under the law.

Date: March 28, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtors' Objection to Motion for Relief from Stay filed by NewRez LLC d/b/a Shellpoint Mortgage Servicing to be served on all parties on the clerk's service list through the CM/ECF system.

Date: March 28, 2024

/s/ Michael A. Cibik
Michael A. Cibik